

Estimated Hearing Date: To be announced by Court

Objection Deadline: To be announced by Court

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of
THE COMMONWEALTH OF PUERTO RICO,
et al.

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**PLAINTIFF BLANCA IRIS MARRERO'S FURTHER
CONSENTED MOTION FOR EXTENSION OF TIME TO FILE REPLY OR
OTHERWISE INFORM AGREEMENT WITH DEBTORS**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

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TO THE HONORABLE LAURA TAYLOR SWAIN,
UNITED STATES DISTRICT JUDGE:

COMES Now, State Court Plaintiff Blanca Iris Marrero (“claimant”), represented by the undersigned attorneys, and very respectfully avers and prays as follows:

1. On June 12, 2022 at ECF No. 21192 the appearing claimant filed her application for payment of administrative expenses on account of a civil tort claim filed at the Puerto Rico Court of First Instance, San Juan Superior Part.
2. On August 26, 2022 at ECF 21931 the Debtors Commonwealth of Puerto Rico (“Commonwealth”) and Public Buildings Authority (“PBA”) filed their objection to claimant’s application.
3. As stated to this Honorable Court in previous motions, Counsel for the Commonwealth and the PBA, and the appearing creditor, after several conferences, have made substantial advances in the processing of this matter and have exchanged drafts of a proposed settlement agreement which will put to an end this contested matter.
4. The most recent draft stipulation agreement which would settle the pending controversy was sent by the appearing creditor to the Proskauer law firm, counsel for the Commonwealth and PBA. Counsel for the Commonwealth and PBA informed that they needed to discuss the same with the Commonwealth and PBA, and as a result had consented that the appearing party be granted until February 10, 2023 to file her reply to their opposition to the application for payment of administrative expenses, or alternatively for the parties to this contested matter to file their stipulation.
5. Subsequently, brother counsel for Proskauer informed that they needed a further extension of time, lapsing on March 3, 2023, to address certain indemnity issues regarding the insurance policies in this matter. Through inadvertence, the undersigned put the February

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10, 2023 date as February 20, 2023 in his calendar, instead of February 10, 2023, to wit, five (5) days ago. We apologize to this Honorable Court for the unintentional delay in filing this motion but no harm will be effected to the parties in granting the same. The communications between counsel have been professional and cordial and we believe we are close to solving this matter through a stipulation between the parties, as we have timely advised this Honorable Court previously.

6. In light of the above stated, counsel for the Commonwealth and PBA have amiably agreed to grant claimant herein until Friday March 3, 2023 to file any reply, if needed, to the opposition to claimant's administrative claim, or alternatively to allow the stipulation to be filed, and also that the matter be moved to the next available hearing date in February or March, 2023, if necessary.

NOTICE

Notice of this Motion has hereby been served by CM/EF and on the Master Service List posted on the website of the Debtor's Claims and Noticing Agent, by e-mail or by first-class mail.

No prior request for the relief sought herein has been made to this Court or to any other court.

WHEREFORE, the appearing Claimant offers her excuse for the five (5) day delay in filing this further motion, and respectfully requests that this Court allow movant herein to file her reply to ECF 21931, if needed, by Friday, March 3, 2023, and that the hearing on the issue be set for the next available date on March, 2023 or later, if necessary, with any other appropriate relief.

RESPECTFULLY SUBMITTED.

Dated: February 15, 2023

Respectfully submitted,

s/ Fernando Van Derdys, Esq.

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USDC-PR 201913

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